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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**CECILIA RAMOS,**

Plaintiff,

v.

**CREDIT MANAGEMENT, LP.,  
SYNCHRONY BANK, WELLS  
FARGO FINANCIAL NEVADA,  
INC., and EXPERIAN  
INFORMATION SOLUTIONS,  
INC.**

Defendants.

**Case No.: 2:15-cv-00277-APG-GWF**

**STIPULATION AND  
ORDER TO EXTEND TIME FOR  
PLAINTIFF TO RESPOND TO  
DEFENDANT WELLS FARGO  
FINANCIAL NEVADA, INC.'S  
MOTION TO DISMISS**

**[SECOND REQUEST]**

Plaintiff, CECILIA RAMOS (“Plaintiff”), and Defendant, WELLS FARGO FINANCIAL NEVADA, INC. (“Wells Fargo”), hereby submit the following Stipulation to Extend Time for Plaintiff to Respond to Wells Fargo’s Motion to Dismiss. The current deadline is set for June 22, 2015.

1. Plaintiff’s Complaint was filed on February 17, 2015. [Dkt. No. 1]
2. Wells Fargo filed its Motion to Dismiss [Dkt. No. 12] on May 22, 2015.
3. Plaintiff and Wells Fargo have agreed to an extension of time of 14 days, up to and including July 6, 2015 for Plaintiff to respond to Wells Fargo’s Motion To Dismiss.
4. This second request is not made for purposes of delay, but rather to allow the parties to explore settlement.

The parties therefore respectfully request this Court enter an order granting an extension of time of 14 days, up to and including July 6, 2015, for Plaintiff to respond to Wells Fargo’s Motion to Dismiss.

DATED: June 22, 2015

SNELL & WILMER

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**IT IS SO ORDERED:**

Plaintiff shall have 14 days, up to and including July 6, 2015, to respond to Wells Fargo's Motion to Dismiss.

Dated: June 22, 2015.



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UNITED STATES DISTRICT JUDGE